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October 4, 2022

VIA ECF

Honorable Cecilia G. Morris, U.S.B.J.
United States Bankruptcy Court
Southern District of New York
Poughkeepsie Division
355 Main Street
Poughkeepsie, New York 12601

RE: *Rodney Omanoff v. Bradley C. Reifler, et al.*
Adversary Proceeding Case No. 22-09002-cgm

Dear Judge Morris:

We represent Defendant Bowles & Johnson PLLC in the referenced adversary proceeding. We are writing to memorialize that counsel for the parties have agreed to adjourn (i) the motion to withdraw filed by The Law Offices of Scott H. Bernstein LLC [Dkt. 177]; and (ii) the motion to strike filed by Defendants Forefront Partners, LLC, Talking Capital Windup LLC, Talking Capital Partners II, LLC, Talking Capital Partners III, LLC, Bowles & Johnson PLLC, David K. Bowles, Margaret A. Johnson. [Dkt. 181.] Both motions are adjourned from October 11, 2022 to November 15, 2022 on consent. Further, the deadlines for answering papers and/or reply with respect to either motion, if any, shall be carried forward, and any such papers shall be filed and served in accordance with Local Bankruptcy Rule 9006-1. Finally, in accordance with minute entries on this case's docket, said motions will be heard *via* videoconference. [See Dkts. 182, 183.]

Thank you for your consideration of this matter.

Very truly yours,

KAUFMAN DOLOWICH & VOLUCK, LLP



Anthony J. Proscia, Esq.

Certificate of Service

Anthony J. Proscia, an attorney duly admitted to practice before this Court, certifies that on October 4, 2022, he caused the attached **LETTER** to be electronically filed with the Clerk of the United States Bankruptcy Court for the Southern District of New York *via* CM/ECF system, which sent notification of such filing to all attorneys and all parties who have entered an electronic appearance in this case; and *via* email to the following:

- William K. Harrington, Esq. and Alicia. M. Leonhard, Esq. of the Office of the United States Trustee for the Southern District of New York (ustpreion02.pk.ecf@usdoj.gov and alicia.m.leonhard@usdoj.gov);
- Andrew D. O'Toole, Esq. of O'Toole & O'Toole PLLC, Attorneys for Chapter 7 Trustee Marianne T. O'Toole (aotoole@otoolegroup.com);
- Michael D. Siegel, Esq. of Siegel & Siegel P.C., Attorneys for Debtor Bradley C. Reifler in Case No. 17-35075 (CGM) (sieglaw@optonline.net);
- Scott Bernstein, Esq., outgoing Attorney for Plaintiff Rodney Omanoff in the captioned case (sbernsteinlawoffices@gmail.com);
- Michael P. Pasquale, Esq. of Law Offices of Michael P. Pasquale, LLC, Attorney for Plaintiff Rodney Omanoff (mpasquale@mpplawoffices.com);
- Moshie Solomon, Esq. of Golenbock Eiseman Assor Bell & Peskoe LLP, incoming Attorney for Plaintiff Rodney Omanoff (msolomon@golenbock.com);
- David K. Bowles, Esq. of Bowles & Johnson PLLC, Attorneys for Defendants Forefront Partners, LLC; Talking Capital Windup LLC; Talking Capital Partners II, LLC; Talking Capital Partners III, LLC; Margaret A. Johnson, Esq.; and David K. Bowles, Esq. (david@bojo.law); and
- Gregory L. Smith, Esq. of The Law Office of Gregory L. Smith, Attorneys for Non-Party David Wasitowski (glsl@logls.com);



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